

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

United States of America,  Plaintiff,  v.  Dennis E. Hecker,  Defendant.	Case No. 0:10-CR-32 (01) JNE/SRN  <b>MOTION FOR EARLY DISCLOSURE OF POST CONSPIRACY STATEMENTS OF CO-DEFENDANT</b>
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The defendant, DENNIS E. HECKER, by and through his undersigned counsel, Brian N. Toder, respectfully moves this Court pursuant to Rule 16(c) of the Federal Rules of Evidence and the authority of *Bruton v. United States*, 391 U.S. 123 (1968), for an order as follows:

1. Compelling the government to give notice and disclosure of intent to use or refer to, and/or introduce into evidence at trial the statements or confessions of any defendant or unindicted co-conspirator, together with designation or which statement or confessions the government plans to so utilize; and
2. Granting defendant's leave to file motions for severance, suppressions, and/or in limine as indicated by the government's response and a

review of the relevant *Bruton* materials.

This motion is based upon the indictment, the records and files in the above-entitled action, and any and all other matters which may be presented prior to or at the time of hearing of said motion.

Respectfully submitted,

Dated: June 1, 2010

**CHESTNUT CAMBRONNE PA**

By /s/ Brian N. Toder

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